

EXHIBIT 1



U. S. Department of Justice

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December 28, 2021

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Re: United States v. Yaser et al
 Court No. 4:21-CR-06042-SMJ

Dear Counsel:

The following table details **in bold** what is being disclosed as part of this initial disclosure. This initial disclosure is being provided to you on a government provided USB drive. A password to access the USB drive will be sent to you via e-mail. You must return this USB drive immediately after copying its contents. The United States has filed an unopposed protective order. Even though the protective order has yet to be granted, we request that you treat the discovery as though the order has been granted. The disclosures are detailed as follows:

Disclosure	Description	Date of Production
1	Bates Numbered Reports: 10000001 – 10002606: FBI Reports & Investigative Materials 20000001 – 20000354: CHS Audio Files 30000030-30000077, 30000112-30000114, 30000117-30000129, 30000136-30000137: Search Warrants¹ 40000001 – 40000018: Additional Reports 50000001 – 50000015: Recorded Interviews	USB Drive Shipped Via FedEx December 28, 2021

¹ Search warrants out of the Southern District of California remain subject to a sealing order. The United States is in the process of seeking unsealing for the purpose of discovery disclosures.

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	60000001 – 60006522: Claim Files 70000001 – 70000544: Bank Records 80000001 – 80000689: Other Disclosures Total GB: 106	
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If you are unable to copy the discovery from the USB drive, please contact the U.S. Attorney's Office as soon as possible. Likewise, if you have any difficulty with viewing any of the produced items, please contact the office immediately. If you do not contact this office, we will presume that you have received and were able to view/download all the above referenced discovery.

At this time, the United States anticipates additional discovery materials will be provided as they are received and processed by the U.S. Attorney's Office. Additional discovery material is likely to include, but may not be limited to, grand jury transcripts, electronically stored information (ESI) (e.g. digital forensic copies of electronic devices), video surveillance (i.e. pole cam footage), law enforcement reports, and other documents (including but not necessarily limited to any Giglio / Henthorn material) that may be relevant to this matter.

Numerous electronic devices were seized by the FBI pursuant to the search warrants executed during the investigation. Each device seized is identified in the search warrant returns. The FBI imaged most, but not all of the devices. If you would like copies of all electronic devices that the FBI seized and was able to image, please send an external hard drive containing at least 14 TBs of storage capacity directly to FBI Special Agent Matthew McKay, at the FBI Office, Suite 199, 825 Jadwin Avenue, Richland, Washington, 99352. Special Agent McKay will then send your external hard drive to the FBI CART Unit in Seattle, Washington, to process the seized and imaged ESI on to your hard drive. If you do not want all the ESI but only a copy of the ESI that may have been seized from your client (Note: ESI was not seized from every named defendant) or a particular co-defendant(s), please let us know. As a further note, ESI the FBI seized from defendant Maria Elena Sanchez is still undergoing a filter review for potential attorney-client privilege information and has not been made available to the prosecution team. If you have any questions about this particular ESI, please contact Assistant United States Attorneys George J. C. Jacobs, III or Dominique Juliet Park.

Physical evidence is available for your inspection by contacting Assistant United States Attorneys George J.C. Jacobs, III or Dominique Juliet Park to arrange a mutually convenient date and time.

Very truly yours,

Vanessa R. Waldref
United States Attorney

s/ George J.C. Jacobs, III
George J.C. Jacobs, III
Dominique Juliet Park
Assistant United States Attorneys